WHEREAS, the Banking Commissioner ("Commissioner") is charged with the administration of Sections 36a-671 to 36a-671f, inclusive, of Part II of Chapter 669 of the Connecticut General Statutes, "Debt Adjusters and Debt Negotiation";

WHEREAS, Legal Services is a New Jersey limited liability company with a place of business at 8 Wilson Ave, Newark, New Jersey, at all times relevant hereto;

WHEREAS, Pedroso is an attorney licensed in the State of New Jersey, Attorney ID #0343981996, and is the managing attorney of Legal Services. Pedroso has never been admitted to practice law in Connecticut:

WHEREAS, neither Respondent has ever been licensed to engage or offer to engage in debt negotiation in this state;

WHEREAS, the Commissioner, through the Consumer Credit Division of the Department of Banking, has investigated the activities of Respondents pursuant to Section 36a-17 of the Connecticut General Statutes to determine if they had violated, were violating or were about to violate the provisions of the Connecticut General Statutes within the jurisdiction of the Commissioner;

WHEREAS, as a result of such investigation, on November 19, 2020, the Commissioner, acting pursuant to Sections 36a-671a(b), 36a-52(a), 36a-50(c) and 36a-50(a) of the Connecticut General Statutes, issued an Order to Make Restitution, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing against Respondents (collectively "Notice"), which Notice is incorporated by reference herein;

WHEREAS, the Commissioner alleged in the Notice that each Respondent engaged or offered to engage in debt negotiation in this state without obtaining the required license, in violation of Section 36a-671(b) of the Connecticut General Statutes, in effect prior to October 1, 2017. Such violations form the basis to issue an order to cease and desist against each Respondent pursuant to Sections 36a-671a(b) and 36a-52(a) of the Connecticut General Statutes, issue an order to make restitution against each Respondent pursuant to Sections 36a-671a(b) and 36a-50(c) of the Connecticut General Statutes, and impose a civil penalty upon each Respondent pursuant to Sections 36a-671a(b) and 36a-50(a) of the Connecticut General Statutes;

WHEREAS, on November 20, 2020, the Notice was sent by certified mail, return receipt requested, to Legal Services (Certified Mail. Nos. 70191640000015848617 and 70191640000015848501) and Pedroso (Certified Mail No. 70191640000015848624);

WHEREAS, Respondents failed to request a hearing within the statutory prescribed time period; WHEREAS, on January 12, 2021, as a result of Respondents' failure to request a hearing, the Commissioner issued an Order to Cease and Desist and Order Imposing Civil Penalty ("Order");

WHEREAS, on February 8, 2021, Respondents filed a Petition for Reconsideration of the Order asserting that Respondents had not received prior notices by mail, and on February 26, 2021, the Commissioner granted such Petition for Reconsideration;

WHEREAS, on March 15, 2021, Respondents requested a hearing on the allegations set forth in the Notice and such hearing is currently scheduled for June 3, 2021;

WHEREAS, Section 4-177(c) of the Connecticut General Statutes and Section 36a-1-55(a) of the Regulations of Connecticut State Agencies provide that a contested case may be resolved by consent order, unless precluded by law;

WHEREAS, the Commissioner and each Respondent acknowledges the possible consequences of formal administrative proceedings, and each Respondent voluntarily agrees to consent to the entry of the sanctions imposed below without admitting or denying the allegations set forth herein, and solely for the purpose of obviating the need for further formal administrative proceedings concerning the allegations contained in the Notice and set forth herein;

WHEREAS, the Commissioner and each Respondent now desire to resolve the matters alleged in the Notice and set forth herein;

WHEREAS, each Respondent agrees that the Notice may be used in construing the background of this Consent Order and agrees to the language of this Consent Order;

WHEREAS, each Respondent specifically assures the Commissioner that the violations alleged herein shall not occur in the future;

WHEREAS, Respondents represent that since April 1, 2014, they have only entered into one agreement for loan modification services with a Connecticut resident, who is identified in Exhibit A attached hereto:

WHEREAS, each Respondent acknowledges that this Consent Order is a public record and is a reportable event for purposes of the regulatory disclosure questions on NMLS, as applicable;

WHEREAS, Legal Services, through its execution of this Consent Order, voluntarily agrees to waive its procedural rights, including an opportunity for a hearing as it pertains to the allegation contained in the Notice and set forth herein, and voluntarily waives its right to seek judicial review or otherwise challenge or contest the validity of this Consent Order;

AND WHEREAS, Pedroso, through his execution of this Consent Order, voluntarily agrees to waive his procedural rights, including an opportunity for a hearing as it pertains to the allegation

contained in the Notice and set forth herein, and voluntarily waives his right to seek judicial review or otherwise challenge or contest the validity of this Consent Order.

CONSENT TO ENTRY OF SANCTIONS

WHEREAS, Legal Services and Pedroso, through their respective execution of this Consent Order, consent to the Commissioner's entry of a Consent Order imposing the following sanctions:

- 1. Legal Services and Pedroso shall cease and desist from engaging or offering to engage in debt negotiation in this state without obtaining the required license, in violation of Section 36a-671(b) of the Connecticut General Statutes;
- 2. No later than the date this Consent Order is executed by Legal Services and Pedroso, Legal Services and Pedroso, jointly and severally, shall: (a) repay Eight Thousand Two Hundred Dollars (\$8,200) by cashier's check, certified check or money order to the individual identified in Exhibit A attached hereto and (b) send such repayment to Carmine Costa, Director, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800; and
- 3. Legal Services and Pedroso, jointly and severally, shall remit to the Department of Banking by electronic funds transfer, cashier's check, certified check or money order made payable to "Treasurer, State of Connecticut", the sum of Ten Thousand Dollars (\$10,000) as a civil penalty in twenty (20) monthly installments of Five Hundred Dollars (\$500). The first payment shall be due no later than the date this Consent Order is executed by Respondents, and all following payments shall be due on the first of each month, beginning on June 1, 2021 and ending on December 1, 2022.

CONSENT ORDER

NOW THEREFORE, the Commissioner enters the following:

- 1. The Sanctions set forth above be and are hereby entered;
- 2. Upon issuance of this Consent Order by the Commissioner, this matter will be resolved and all claims asserted or that could have been asserted by the Commissioner against Legal Services or Pedroso in connection with the allegations set forth herein, and no further proceedings or actions will be brought by the Commissioner against Legal Services or Pedroso in connection with the allegations set forth herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against Legal Services or Pedroso based upon a violation of this Consent Order or the matters underlying its entry, if the Commissioner determines that compliance with the terms herein is not being observed or if any representation made by Legal Services or Pedroso and reflected herein is subsequently discovered to be untrue;
- 3. Legal Services and Pedroso shall not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any

allegation referenced in this Consent Order or create the impression that this Consent Order is without basis. Nothing in this paragraph affects Respondents' (i) testimonial obligations, or (ii) right to take legal or factual positions in defense of litigation or other legal or administrative proceedings to which this Commissioner and/or the Department are not parties. This Consent Order is not intended for use by any third party in any other proceeding and is not intended, and should not be construed, as an admission of liability by Respondents;

- 4. This Consent Order shall be binding upon Pedroso and Legal Services and its successors and assigns; and
- 5. This Consent Order shall become final when issued.

, ,			
/s/			
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Issued at Hartford, Connecticut this 18th day of June 2021.

Jorge L. Perez Banking Commissioner I, Filipe Pedroso, Esq., state on behalf of Pedroso Legal Services LLC a/k/a elawni.com that I

have read the foregoing Consent Order; that I know and fully understand its contents; that I am authorized

to execute this Consent Order on behalf of Pedroso Legal Services LLC a/k/a elawnj.com; that Pedroso

Legal Services LLC a/k/a elawni.com agrees freely and without threat or coercion of any kind to comply

with the sanction entered and terms and conditions ordered herein; and that Pedroso Legal Services LLC

a/k/a elawnj.com voluntarily agrees to enter into this Consent Order, expressly waiving the procedural

rights set forth herein as to the matters described herein.

By: <u>/s/</u>

Name: Filipe Pedroso, Esq.

Title: President

Pedroso Legal Services LLC a/k/a elawnj.com

State of: New Jersey

County of: Somerset

On this the 1st day of June 2021, before me, Sarah Petrushka, the undersigned officer, personally

appeared Filipe Pedroso, Esq., who acknowledged himself/herself to be the President of Pedroso Legal

Services LLC a/k/a elawnj.com, a member managed/manager managed limited liability company, and

that he/she as such President, being authorized so to do, executed the foregoing instrument for the

purposes therein contained, by signing the name of the limited liability company by himself/herself as

President.

In witness whereof I hereunto set my hand.

Notary Public – Sara M. Petrushka

Date Commission Expires: March 27, 2025

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I, Filipe Pedroso, state that I have read the foregoing Consent Order; that I know and fully

understand its contents; that I attest to the representations made herein and agree freely and without threat

or coercion of any kind to comply with the terms and conditions stated herein; and that I consent to the

entry of this Consent Order.

By: <u>/s/</u>

Filipe Pedroso

State of: New Jersey

County of: Somerset

On this the 1st day of June, 2021, before me, Sarah Petrushka, the undersigned officer, personally

appeared Filipe Pedroso, known to me (or satisfactorily proven) to be the person whose name is

subscribed to the within instrument and acknowledged that he executed the same for the purposes therein

contained.

In witness whereof I hereunto set my hand.

Notary Public – Sarah M. Petrushka

Date Commission Expires: March 27, 2025

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